<div align="center">REMARKS</div>

Reconsideration and allowance in view of the foregoing amendments and the following remarks is respectfully requested.

In this response, the subject matter of claim 12 has been introduced into claim 10 and claim 12 has been cancelled. Claims 10-11 and 13-18, therefore remain pending in the application.

Rejections under 35 USC § 103

The rejections of:

1) Claims 10-12 and 17 under 35 USC §103(a) as being unpatentable over Alhir (<u>Learning UML</u>, published July 2003), and further in view of "I-Logix Introduces Wizard-Based Documentation Product for Web Publishing to Facilitate Team Collaboration," 8 May 2000, hereafter I-Logix);

2) Claims 13 and 15-16 under 35 USC §103(a) as being unpatentable over Alhir and I-Logix and further in view of "Bringing It All Together" (July 2002, hereafter BIAT); and

3) Claim 18 under 35 USC §103(a) as being unpatentable over Alhir and I-Logix, and further in view of Pastor et al. (US 6,681,383, filed 4 April 2000, hereafter Pastor);
are respectfully traversed.

In order to better define the invention, and more particularly the documentation updating feature, the Applicants combine the subject matter of claims 10 and 12 in view of the fact that the step of establishing dynamic links is neither taught nor suggested by the references or any combination thereof.

The Applicants have already discussed the Alhir and BIAT references. It should be noted again that Alhir deals only with "… the structure of a system in general and at a particular point in time…" (first lines of Chapter 3, page 1 of 20). This clearly means that this reference cannot provide any suggestion with respect to a documentary chain, and even less about the updating and traceability of a documentation.

The "I-Logix" reference does not disclose any detail about the step of creating documents from "templates". This reference describes shortly the "Rhapsody-Reporter" tool, which is a tool for extracting and processing information in view to create "templates" and to generate documents according to predefined formats (see e.g. 3rd § in first page: "Predefined reports combined with a customizable template generation …"). To sum up, this reference

mentions only the aim without disclosing the steps necessary for manufacturing a final document.

With respect to the position that the Examiner has taken with respect to claim 10:

- "*Alhir discloses a method for production of a documentary chain*": The Applicants have already pointed out (March 2009) that this reference does not even the word "documentation" or "documentary chain",

- "*generating of documentary fragments of the model (Section 3.1.1....)*" : this section relates to "classes" ("classes that represent <u>concepts</u>" as said in 3.1),

- "*However, I-Logix discloses selecting a fragment from a tree whose tree structure...*" (last § of page 3 of the Action) : Applicants have carefully read this reference, but did not find any "tree", even when "reading between the lines". Therefore, the Examiner should make the record clear by explaining <u>where</u> the allusive reference/suggestion to such a tree is to be actually found. Until this done satisfactorily it is submitted that a *prima facie* case of obviousness cannot be established.

Further, in this rejection the Examiner acknowledges that Alhir <u>fails </u>to specifically disclose opening a document with a text processor. To overcome this and without any reasoning to do so the rejection turns to I-Logix as disclosing:

> opening a document with a text processor (page 1: Here, a user
> is presented with an interface prompt into which he/she enters
> text information for building a report in Microsoft® Word®).

How the hypothetical person of ordinary skill is aware of what is <u>not</u> disclosed in the Alhir and knows what to seek out in order to arrive at the claimed subject matter has not been established. This must therefore be seen as being aided with impermissible hindsight.

The rejection further admits that Alhir <u>fails</u> to specifically disclose selecting a fragment from a "tree" whose tree structure echoes the architecture of the packages of the starting model and inserting the fragment at its location in the document. However, the rejection goes on to assert that I-Logix discloses selecting a fragment from a "tree" whose tree structure (note the above comments regarding the apparent absence of any disclosure of this feature) which echoes the architecture of the packages of the starting model and inserting the fragment at its location in the document. The rejection then advances that I-logic discloses that a user selects a customizable template, or starting model. The user is queried, via a Wizard, to enter information, such as diagrams, codes, and descriptions. Upon completion of this data entry, a

report is generated by inserting the gathered data into the starting model).

Based on this, it is asserted that it would have been obvious to one of ordinary skill in the art at the time of the applicant's invention to have combined I-Logix with Alhir, since it would have allowed a user to be guided, via a Wizard, through creation of a modeling report.

However, the rejection again fails in that just what the Examiner means by "via a Wizard" is not clear, nor is it clear how this "Wizard" would be enabled in the UML environment of the primary reference utilizing Microsoft® Word®.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

Early issuance of a Notice of Allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
LOWE HAUPTMAN HAM & BERNER, LLP

Kenneth M. Berner

Kenneth M. Berner
Registration No. 37,093

1700 Diagonal Road, Suite 300
Alexandria, Virginia 22314
(703) 684-1111
(703) 518-5499 Facsimile
Date: April 22, 2010
KMB/KJT/bjs